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March 7, 2014

Letter – Expression of Interest VIA ECFS

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

Re: Expression of Interest – Rural Broadband Trials Connect America Fund, WC Docket No. 10-90

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

This letter is to express THE SEA RANCH ASSOCIATION's interest in participating in the Rural Broadband Trials announced at the January 30th FCC Open Meeting. We take this opportunity to document The Sea Ranch's need for high-speed Internet service. We respectfully ask the Federal Communications Commission to consider our area's need when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

Background

The Sea Ranch is a private, planned residential community located on California State Highway One (Shoreline Highway) along 10 miles of coastal Sonoma County. The Association consists of about 2240 members (lot owners). About 1850 lots are developed with mostly single-family residences.

Geographic Territory

The community is bordered on the west by the Pacific Ocean and on the east by the ridges of the coast range and dense redwood forest. The nearest commercial community is Gualala (unincorporated) immediately north of The Sea Ranch, across the Gualala River in Mendocino County. The community is isolated, weather conditions can be harsh, and municipal services are limited. TSRA owns and operates its own water company while all other services and utilities are either contracted, left to private providers, or simply do not exist locally. Notable in this regard is lack of adequate, reliable access to services delivered over the internet.

Proposed technology

The current patched together network of services and providers has been insufficient, unreliable, and by most measures, expensive for some time. Customer service is equally inconsistent. In 2001, a TSRA task force was created through the manager's office to study current and future telecommunications needs and make recommendations to the Board of Directors. The task force unsuccessfully explored options to improve service with local vendors including Central Valley Cable (CVC), and Verizon. It eventually disbanded without significant action.

In 2012, TSRA's Utility Committee began to look at the issues surrounding the community's lack of broadband connectivity. A sub-committee of volunteers with various levels of professional expertise reviewed the previous work and initiated new conversations with the major service providers. While some localized progress was made with Verizon and AT&T to improve cellular phone service, it again became clear that major internet service providers could not be recruited to the community due to its isolation and small market potential. Efforts to partner with CVC to upgrade its existing service have been unproductive, and efforts to upgrade land-line telephone service have been equally problematic.

In the late 2012 and early 2013 the subcommittee in conjunction with the TSRA Finance Committee prepared a preliminary business model for the construction and operation of a Fiber To The Home (FTTH) network.

Existing Providers

Central Valley Cable maximum speeds available are 10 Mbps/1 Mbps at monthly cost of approximately \$120. Verizon has recently started offering DSL services to some areas of The Sea Ranch. A crucial limitation on both of these services lies a deteriorating infrastructure which relies on either coaxial cable or copper wire in the ground. A significant number of residents still use dial up modem connections over telephone lines offered by a variety of providers in a wide range of prices. Some Sea Rancher's use wireless solutions through their mobile phones at significantly high prices, but cell phone coverage on The Sea Ranch is very spotty. Others utilize Hughes Net and other satellite providers at costs that vary depending on the subscriber's ability to stay within limited monthly usage caps. An increasing number of residents need to be able to telecommute and operate home businesses utilizing internet connectivity, and their ability to do so is extremely limited.

List of Anchor Institutions

Healthcare: Sea Ranch residents have been, historically, an older demographic with proportionately higher than average health needs. The nearest hospitals and specialty medical service/care facilities are two hours away, with travel over rugged coastal highways and county road. Access to diagnostic and other broadband reliant health care services is becoming increasingly critical to allow residents to age in place rather than being forced to relocate away from their community to achieve proximity to needed health care.

Community Centers: The Sea Ranch Association operates three community recreational facilities on The Sea Ranch.

Thank you for considering our Expression of Interest in your decisions about the amount of funding that will be allocated in the Rural Broadband Trials. We commend you in this effort to connect rural communities and are ready to help you close the digital divide.

Sincerely,

Frank M. Bell Community Manager The Sea Ranch Association The Sea Ranch, CA